



The webinar is about to start in 1 minute.

(no sound, just yet)



Practicalities

- Your microphone is muted
- Questions: please send them in the Q&A function; we will take time at the end
- Recording will be shared post-event
- Polls & Survey: please share your feedback

Thanks for being here!



Thank you for joining us today!



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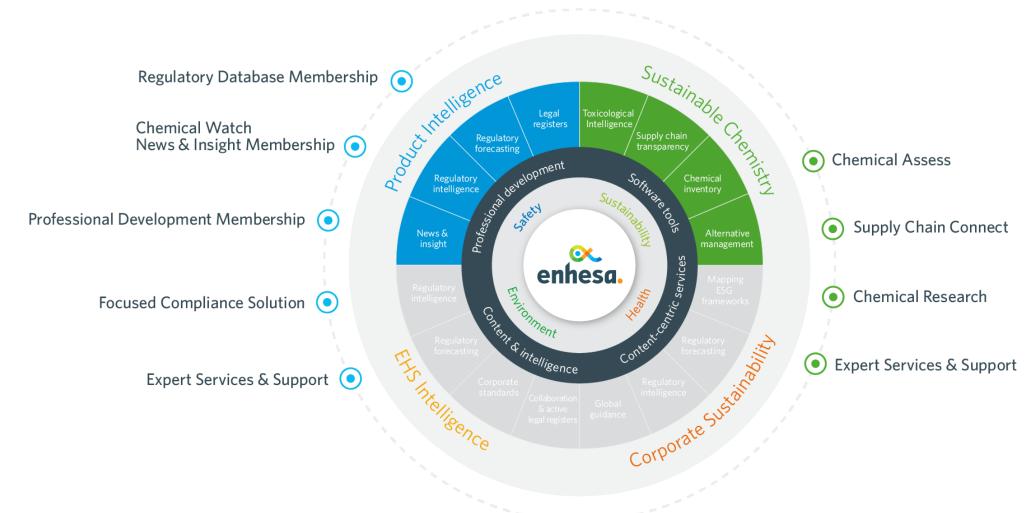
Enhesa empowers businesses to meet and go beyond compliance, manage risks and achieve sustainable business practices.

We do this by transforming complex regulatory landscapes into timely intelligence and foresight, creating industry leaders in environment, health, safety and sustainability.

- Understand what you need to do
- Act upon developments
- Plan for changes to future-proof your business

Enhesa Sustainable Chemistry for safer, greener chemicals

Enhesa Product Intelligence: To achieve market access & reduce the risks of non-compliance

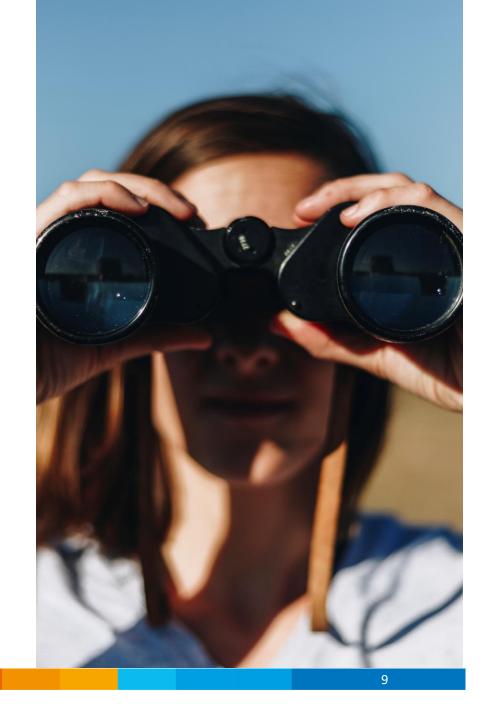






Regulatory Monitoring

- Leveraging the full capabilities of Enhesa data, expertise and technology, our team of seasoned regulatory experts track and monitor regulations on your behalf, ensuring your compliance activities inform your business strategy
- With Regulatory Monitoring, our team will track regulations for you, extending your team with our own experts so you have your finger on the pulse of factors influencing your products to make key strategic decisions and changes early
- We'll work closely with you to determine and define the topics that matter to your organization, unpack the key requirements and stay on top of change
- We'll feed all this back to you in a monthly report that tells you exactly what you need to be focused on and what you need to do to comply





Regulatory Monitoring Agenda

- Ecodesign
- Labeling
- Extended producer responsibility (EPR)
- Safety
- Restricted substances



Ecodesign

ESPR Working Plan 2025-2030

- In April 2025, the European Commission (EC) adopted the 2025-2030 working plan for the Ecodesign for Sustainable Products Regulation (ESPR)
 - The plan provides a list of products that should be prioritized to introduce ecodesign requirements and energy labelling over the next five years
- Textiles with a focus on apparel are among the priority products for ecodesign requirements, based on their potential to deliver on the circular economy
- Future ecodesign requirements will cover two elements:
 - Product performance, such as minimum durability, minimum energy and resource-efficiency, availability of spare parts or minimum recycled content; and/ or
 - Product information, including key product features such as the products' carbon and environmental footprint, mainly made available via the Digital Product Passport (DPP)





Ecodesign

EU draft regulation on unsold sustainable products

- On 30 June 2025, the EU issued a draft delegated regulation to set out ecodesign requirements for sustainable products
- The draft details exemptions to the prohibition on destroying unsold consumer products, particularly apparel and footwear, which will take effect on 19 July 2026
- The draft outlines circumstances under which unsold apparel and footwear may be destroyed:
 - Health, hygiene and safety reasons;
 - O Damage caused to products as a result of their handling, or detected after products have been returned, which cannot be repaired in a cost-effective manner;
 - Unfitness of products for the purpose for which they are intended;
 - Non-acceptance of products offered for donation;
 - Unsuitability of products for preparing for reuse or for remanufacturing;
 - Unsaleability of products due to infringement of intellectual property rights, including counterfeit products; and
 - Destruction being the option with the least negative environmental impacts
- Economic operators would be required to prepare, keep and present specific documentation to prove the above listed circumstances



Labeling

AAFA's digital labeling petition

- In February 2025, the American Apparel & Footwear Association (AAFA) petitioned the US FTC to modernize and allow more sustainable and economic digital labels for required care labeling information:
 - "Care labeling of clothing is currently governed by the Care Labeling Rule, which was promulgated in 1971, before the internet existed. The Rule requires manufacturers and importers to display certain information about apparel, such as care instructions, on a physical label that is affixed to the garment
 - The European Union and other industrialized countries have adopted similar labeling requirements for apparel, so the proliferation of labeling requirements around the world has led to label creep - lengthy labels in small text in multiple languages and with confusing symbols that are hard to read, and understand, printed on large, uncomfortable tags

AMERICAN

- O In order to streamline labels and ensure that consumers can easily access important care information without having to scrutinize hard-to-read and confusing physical labels, the Commission should allow manufacturers to comply with Rule requirements through digital labels. These digital labels, such as a URL or QR code, could be added to apparel either on a very small tag or directly stamped onto the item of clothing"
- The comment period ended 18 April 2025



Canadian 'greenwashing' guidance

- On 5 June 2025, Canada's Competition Bureau issued guidance on environmental claims and the Competition Act
 - The guidance was issued to reflect recent amendments to the Competition Act, which included two new provisions that explicitly address environmental claims
 - O These new provisions build on the provision of the Act that requires that certain claims be evidence-based
- The guidance outlines a series of principles for compliance:
 - Principle 1: Environmental claims should be truthful, and not false or misleading
 - Principle 2: Environmental benefits of a product and performance claims should be adequately and properly tested
 - Principle 3: Comparative environmental claims should be specific about what is being compared
 - Principle 4: Environmental claims should avoid exaggeration
 - Principle 5: Environmental claims should be clear and specific not vague
 - Principle 6: Environmental claims about the future should be supported by substantiation and a clear plan



FTC issues 'Made in the USA' warnings

- On 1 July 2025, the US FTC designated July as "'Made in the USA' Month," and reiterated the Commission's commitment to cracking down on deceptive "Made in the USA" claims
- The FTC sent warning letters to four companies, reminding them to comply with FTC's 2021 Made in USA Labeling Rule
- The FTC also sent letters to Amazon and Walmart regarding allegedly deceptive MUSA claims made by third-party sellers on the two companies' e-commerce websites
- The 2021 Rule prohibits companies from labeling products as "Made in the USA" unless they can establish all of the following:
 - Final assembly or processing of the product occurs in the US;
 - All significant processing that goes into the product occurs in the US; and
 - All or virtually all ingredients or components of the product are made and sourced in the US



EU Product Environmental Footprint Category Rules (PECRF) for apparel & footwear

- In May 2025, the EU approved the final version of the Product Environmental Footprint Category Rules (PEFCR) for apparel and footwear
 - These Rules are part of the product environmental footprint (PEF), a methodology for life-cycle assessments (LCA), and are supported by the Environmental Footprint (EF) 3.1 database developed by the EC
 - The PEFCR establishes a common language for brands, suppliers and auditors to comply with the upcoming EU
 Green Claims Directive and Eco-design regulations
- The PEFCR covers essential factors, such as:
 - O Circularity, including using recycled materials or the ability for the product to be recycled after use;
 - O Durability, meaning a refers to a product's lifespan and how often it can be worn;
 - O The possibility, availability and accessibility of repair; and
 - Fiber fragments, including microplastics





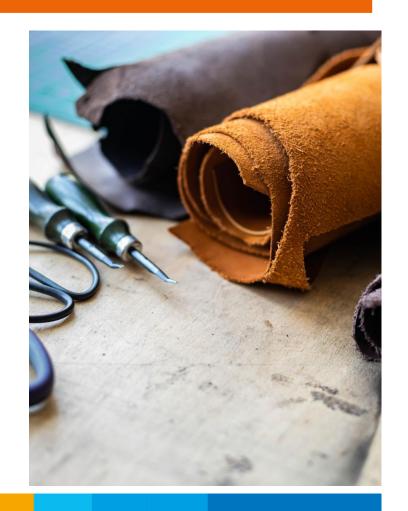
UK 'green claims' guidance

- In September 2024, the UK's Competition and Markets Authority (CMA) issued guidance on greenwashing in fashion, based on the CMA's Green Claims Code
- The guide sets out practical tips on how fashion brands should, amongst other things:
 - Give clear, accurate, and complete information about their products;
 - O Make sure the criteria used to decide which items are included in green collections are clearly set out and detail any minimum requirements and that products are not labelled as part of a sustainable range unless they meet these criteria;
 - O Be clear and specific when using filters or other navigational tools to search for green products; and
 - O Be clear if the claim is based on only specific parts of a product's life cycle
- It also includes a number of illustrated examples to bring the content to life



Türkiye requires labeling of non-textile parts of animal origin

- In April 2025, Türkiye's Ministry of Commerce issued a Notification to address the presence of non-textile parts of animal origin in textile products
- The Notification appears to be based on the country's transposition of the EU's
 Textile Labelling Directive, which requires the non-textile parts of animal origin to
 be indicated by using the phrase "Contains non-textile parts of animal origin" on
 the label
- Türkiye has taken this a step further than the EU with this Notification, however, requiring the label, packaging or documents accompanying the product to indicate which animal the part is obtained from
 - The Notification does not provide any more particulars than this, though; for instance, there is no list of approved animal names, no list of associated names for leather/ suede/ fur/ feathers, etc.





Extended producer responsibility (EPR)

Textiles EPR schemes in the EU and beyond

- In February 2024, the EU issued new rules to better prevent and reduce waste from textiles
 - These rules would cover textile products such as clothing and accessories, blankets, bed linen, curtains, hats, footwear, mattresses and carpets, including products that contain textile-related materials such as leather, composition leather, rubber or plastic
- The rules would set up extended producer responsibility (EPR) schemes, through which economic operators that make textiles available on the EU market would cover the costs for their separate collection, sorting and recycling
 - O Member States would have to establish these schemes 18 months after the entry into force of the Directive
- Additionally, per the revised Waste Framework Directive, each EU Member Sate will be required to have a producer register for textiles EPR, in a harmonized format across the EU
 - The revised Directive is expected to be finalized in 2025



Extended producer responsibility (EPR), cont.

California enacts textiles EPR

- California's Responsible Textile Recovery Act of 2024 was the first textiles EPR law in the US
 - The Act applies to "apparel," meaning clothing and accessory items intended for regular wear or formal occasions and outdoor activities, including undergarments, shirts, pants, skirts, dresses, overalls, bodysuits, suits, scarves, tops, leggings, school uniforms, leisurewear, athletic wear, sports uniforms, swimwear, formal wear, onesies, bibs, footwear, handbags, backpacks, knitted and woven accessories, jackets, coats, snow pants, ski pants and everyday uniforms for workwear
- Producer Responsibility Organization (PRO) applications are due to CalRecycle by 1 January 2026
 - The approved PRO will be required to create a statewide plan for collecting, transporting, repairing, sorting and recycling used apparel
 and textile products
- Producers must join the PRO by 1 July 2026



CalRecycle will also adopt regulations, taking effect no earlier than 1 July 2028



Safety

China regulates footwear safety

- In July 2024, the State Administration for Market Regulation and the Standardization Administration of the People's Republic of China (PRC) issued two mandatory standards on footwear safety
 - GB 25038:2024, General safety requirements for footwear, replaced and abolished GB 21536:2008, on athletic shoes, GB 25037:2010, on industrial rubber boots, and GB 25038:2010 on rubber shoes
 - OB 30585:2024, Safety technical specifications for infants' and children's footwear, replaced a 2014 edition of the standard
 - The standard applies to footwear made of various materials for children and infants up to and including the age of 14 years
- Both standards address physical and mechanical safety, such as shoe shanks and testing for broken needles
- They also address chemicals, such as azo colorants, formaldehyde, heavy metals and phthalates
- The mandatory standards took effect 1 June 2025



Restricted substances

US states take the lead on chemicals legislation

- In January 2025, US President Trump launched a "massive" deregulation initiative, calling for 10 regulations to be repealed for every regulation enacted
- In the face of this change on the federal level, US states have ramped up their legislative activity, particularly around restricted substances
- Data recently prepared by our Product Intelligence Analyst, Melanie Rybar, shows, in the US states, we are tracking a total of 366 bills
 - 77% are active/ pending;
 - 9% have passed into law; and
 - The remainder have died through the legislative process
- PFAS bills make up 30% of all introduced bills
 - Eight of the 32 bills that have passed into law address PFAS

Top mentioned chemicals	No. of legislations
PFAS	108
Lead	25
Formaldehyde	19
Mercury	17
Phenol	17
Phthalates	17
Cadmium	11
Polystyrene	11
Triclosan	10
Ethylene glycol	8

Restricted substances

New Mexico becomes 3rd US state to enact sweeping PFAS ban

- In April 2025, New Mexico banned PFAS in products, making it the third US state to enact such a measure, following Maine and Minnesota
 - O Unlike those states, New Mexico's law does not extend to products containing fluoropolymers
- The PFAS Protection Act (HB 212) bans PFAS in textiles and textile furnishings by 1 January 2028
- The ban extends to all PFAS-containing products by 1 January 2032, except those deemed an unavoidable use or subject to a sector-wide exemption
- State regulators will also need to develop rules around currently unavoidable use (CUU) exemptions, product testing and more

Minnesota extends PFAS reporting deadline

- In June 2025, the Minnesota Pollution Control Agency (MPCA) announced it will
 extend the 2026 deadline for manufacturers to report on products sold in the
 state that contain intentionally added PFAS, with a new timeline to be decided
 soon
 - Giving companies more time beyond the 1 January 2026 reporting deadline mandated by Amara's Law is necessary "to ensure program success"
- Industry groups previously urged the Agency to extend the deadline, in part due to the lack of a finalized rule or reporting platform, in comments submitted on a draft version of the Law released in April





France bans PFAS in textiles

- In February 2025, France enacted Law No. 2025-188 prohibiting the use of PFAS in products including textiles
- The ban takes effect 1 January 2026 for clothing and footwear and their waterproofing agents
 - Clothing and footwear designed for the protection and safety of persons, such as those of the military or firefighters, are exempt
- The ban will be extended on 1 January 2030 to all textiles containing PFAS
 - O Technical textiles for industrial use will be exempt
- These bans will not apply to products containing only traces of PFAS
 - O Residual concentration thresholds will be defined by decree





Canada requires PFAS reporting

- In July 2024, the Canadian government issued a mandatory data call-in for 312 types of PFAS manufactured, imported or used in products above certain thresholds in 2023
 - O Reporting applied to textile products such as clothing, footwear, bedding, sleeping bags and towels
- The mandate applies to Canadian businesses that meet any of the following threshold criteria for calendar year 2023:
 - Manufactured any of the 312 listed PFAS in a quantity above 1,000 grams (2.2 lbs);
 - imported more than 10 g (0.35 oz) of a part 1 PFAS or more than 100 kg (220 lbs) of a part 2 or 3 PFAS, whether the substance was alone or present above 1 ppm in a mixture, product or in one of 12 specified categories of reportable manufactured items;
 - O Imported more than 100 kg of any of the 312 listed PFAS above 1 ppm in a manufactured item outside the 12 specified categories; or
 - O Used more than 10 g of a listed PFAS either alone or in a concentration above 1ppm in the manufacture of a mixture, product or item
- Reporting was due 29 January 2025



AFIRM releases RSL v10

- In February 2025, the Apparel and Footwear International RSL Management (AFIRM) Group released v10 of its restricted substances list (RSL)
 - The RSL aims to reduce the use and impact of harmful substances in the apparel and footwear supply chain, by providing a single set of information for maximum and in-depth implementation within the supply chain
- The 10th edition of the RSL includes:
- Updated test methods for azo-amines and arylamine salts, chlorinated benzenes and toluenes, and heavy metals; and
- With regard to per- and polyfluoroalkyl substances (PFAS):
 - A revised total organic fluorine (TOF) limit of 50 ppm;
 - O Revisions to PFOS restrictions, to delineate between "PFOS and its salts" and "PFOS-related substances," including new limits; and
 - The inclusion of PFHXA and its salts and PFHxA-related substance restrictions





Compliance or sustainability?

The lines are blurring...





Compliance to sustainability: What you need to know







Identifying chemicals of concern



What chemicals are you assessing/focusing on?

Existing inventory

Current products

New materials

•••



Do you know what these chemicals are?

What ingredients and impurities are used in your products and processes?

Beyond SDSs



How are you going to assess them?

Do you have the resources – the team, the tools?



Navigating regulations with sustainable chemistry



CHAs can alert you to problematic characteristics even before something is regulated



Looking at watch lists or authoritative/hazard-trait-based lists to identify chemicals of concern that are potentially on radar for regulatory bodies



Following a curated set of news and updates on what is being discussed or considered, potential timelines, etc.



From reactive to resilient

Short-term compliance

Compliant with existing regulations

Mid-term compliance

Ready for upcoming regulations

Long-term compliance & sustainability

Future-proofing against potential regulations & emerging risks

Ingredient disclosure (moving past compliance statements &SDSs)

Regulatory list screening

CHAs
(assessment focus based on specific requirements)

Proactive list screening (chemical groups, watchlists)

Using information across teams and in product/ingredient decisions



What lists to screen to identify problematic substances

Regulatory Lists

- EU Biocidal Products Regulation
- Washington State DoE: Chemicals of High Concern to Children
- California Proposition 65

Chemical Groups

- PFAS
- POPs
- Alkylphenols & APEs
- Lead

Preferred

EPA Safer Chemical Ingredient
List

Informational or Inventory Lists

- Canada DSL
- Australia Inventory of Industrial Chemicals

Screening Lists

- AOEC Asthmagens
- TEDX

Restricted Substance Lists

- AFIRM
- Cradle to Cradle
- ZDHC

Authoritative

- EU CLP Harmonized Classifications
- IARC Cancer Monographs Carcinogen Groups

Watch Lists

- ChemSec
- Green Science Policy Institute
 Six Classes





Example:

Eliminating PFAS from products





Short-term compliance

Following existing PFAS laws and regulations

EU REACH Annex XVII restricts certain PFAS such as PFOA, PFHxS, and their salts and precursors.



Mid-term compliance

Proactively preparing for/acting based on upcoming legal requirements

Proposed PFAS regulations in New York and Washington State, where draft rules aim to restrict or ban certain PFAS in products and drinking water, but these rules have not yet come into force.

Long-term compliance

Eliminating PFAS based on their inherent characteristics

Identifying and addressing all PFAS, including those not yet regulated or proposed for restriction, to meet long-term sustainability and health goals.





Use Case: PFAS & List Screening



Challenge:

PFAS contamination was discovered in apparel—not from the fabric, but from grease used on manufacturing machinery. The chemical wasn't listed on the SDS and was missed by certifications.



Solution: Traced the source to a process aid.

Required full formulation disclosure from suppliers.

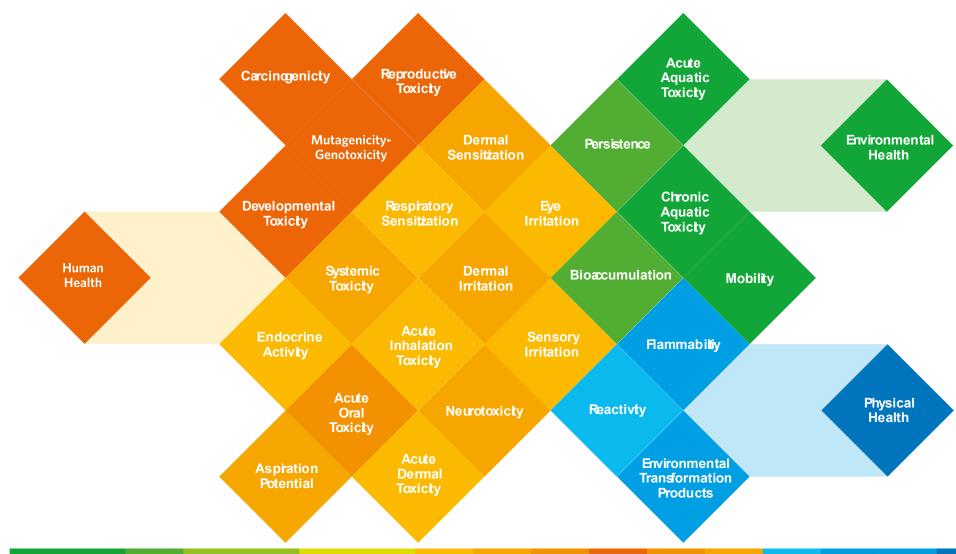
Began screening process chemicals, not just ingredients



Result:

The brand proactively mitigated regulatory and reputational risk, strengthened supplier accountability, and enhanced chemical oversight across its manufacturing processes.

CHAs: 24 toxicological endpoints







Use Case: Chemical Hazard Assessments



Challenge:

A textile brand relied on certifications and supplier SDSs to ensure chemical safety—but still found problematic substances like PFAS and azo dyes in finished products.



Solution:

Evaluate chemicals across 24 endpoints (e.g., CMRs, PBTs).

Identify risks not captured by list screening or certifications.

Inform safer substitution and product design decisions.



Result:

Safer products, proactive decisions to future-proof business ahead of regulations

Missing information from suppliers is putting companies at risk



Source: Enhesa Chemicals Management & Sustainable Chemistry Survey, August 2024. N-399 **Q16.** Which of the following are challenges for you in your supplier engagement efforts?





Use Case: Supply Chain & Full Formulation Disclosure



Challenge:

A global apparel company lacked visibility into the chemicals used across its multi-tier supply chain. Supplier SDSs and certifications didn't capture process chemicals or indirect additives—leading to missed risks, including PFAS and formaldehyde in packaging and finishing treatments.



Solution:

Collect full formulation data from priority suppliers.

Use list screening and CHAs to flag high-risk substances.

Focus first on high-impact areas like coatings, trims, and packaging.

Provide clear guidance and redaction options to reduce supplier friction.



Result:

The company identified hidden risks earlier, prioritized safer alternatives, and built a more resilient, regulation-ready supply chain—strengthening both compliance and brand trust.

How companies usually get started





Where we have seen success:

Similarities:

- Clear definition of chemicals of concern or safer chemistries
- Efficient ways to evaluate chemicals
- Understanding of chemicals in products and processes
- Clear communication and buy in internally and externally

Considerations:

- Use the same criteria to assess potential alternatives
- Empower your suppliers to assess their chemicals using the same criteria
- Put in place corrective action plans for products that include the prioritized chemicals of concern



Proactive strategies for regulatory compliance



Request increased levels of disclosure from your suppliers



Screen entire chemical groups for better compliance



Expand your scope to look at trends in other jurisdictions and product categories



Use the **strictest requirements** to make
decisions



Make sourcing,
development, and
improvement decisions
based on chemical
characteristics



chemistry and packaging in your assessments



Stay updated on proposed changes through various sources



Monitor multiple sources for regulatory trends





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Packaging compliance webcast



Scan QR or <u>click here</u> to watch Stacey's webcast

Product Intelligence solutions demo



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Internal RSLs guide



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